

In The United States District Court
For The Middle District of Pennsylvania

Robert J. Murray
Plaintiff,

Motion for
appointment of
Counsel

v.

Gene Clark
Defendants.

Civil Action No: 4:21-CV-00122

FILED
WILLIAMSPORT
MAY 24 2021
PER NR
DEPUTY CLERK

Pursuant to 28 U.S.C. § 1915(e)(1) plaintiff moves for an order appointing counsel to represent him in this complex case. In support of this motion, plaintiff states:

1. Plaintiff is unable to afford counsel. Plaintiff do not want a pro bono attorney as a matter of fact he's more than willing to do it on a contingency basis, if that's possible Your Honor. I would prefer that really. I know if I were an attorney I would work alot harder knowing the better the outcome the more I get paid.
2. Plaintiff's imprisonment will greatly limit his ability to litigate. The issues involved in this case are extremely complex and needs the expertise of a qualified attorney. I have limited access to the law library and my knowledge of the law is extremely limited Your Honor. I feel like I've went

- as far as I can go in this case without a lawyer. And under Tabron v. Grace, the court must consider whether my claim has "arguable merit in fact and law." And ^{you} have clearly stated that you believe it does Your Honor. Also under Tabron v. Grace, the court then considers additional factors which my case more than qualifies. With all the factors under Tabron v. Grace being meant, this case warrants appointment of counsel at this time. Another very important factor is I have ZERO money. I can't get copies made ^{or} ~~of~~ even afford postage Your Honor. We get 10 pre-paid letters a month. And those are one ounce letters. And most mailings to the court and defense weigh more than that.
3. A trial is more than likely imminent in this case. It will involve conflicting testimony, and counsel would better enable plaintiff to present evidence and cross examine witnesses. It would be a terrible mis-carriage of justice if I'm not appointed counsel by the court.
4. As you already know Your Honor I've made multiple attempts at retaining counsel and up to this point I've been unsuccessful.

Wherefore, the plaintiff requests that the court appoints Edward J. Rymsza of Miele and Rymsza, P.C. 125 East Third St. Williamsport, Pa. 17701.

Dated: May 23, 2022
Robert J. Murray
Robert J. Murray

Smart Communications/PADOC
SCJ-Dallas

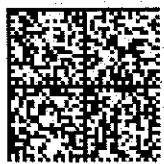
INMATE MAIL

NAME Robert Murray

NUMBER QA2794

SCJ Dallas

1000 Foilles Rd
Dallas PA 18612



US POSTAGE
ZIP 18612 \$
02 4W
0000385735N

RECEIVED
WILLIAMSPORT

MAY 25 2022

NV

PER DEPUTY CLERK

Office of the Clerk
U.S. District Court
Middle District of Pa.
U.S. Courthouse, Suite 218
240 West Third Street
Williamsport, Pa. 17701-6460

17701\$6460 C002

17701\$6460 C002